



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

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DMLIGH@solutia.com On: 01/24/2006 10:55:31 AM

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To: MICHAEL MCATEER cc: BSYARE, rwilliams, LWTAPE

Subject: Sauget Containment Cell & review with Penni Livingston

REPLY TO THE ATTENTION OF:

Mike,

As I mentioned in our call last week to discuss the containment cell, Linda Tape and I met on Friday, January 21 with Penni Livingston to review Sauget Sites in general and the containment cell concept in particular. Kathleen O'Keefe was also in attendance. Kathleen is a local (East St. Louis office) attorney who represents some of the citizens activist groups in the area. (See cards below).

I first explained to Penni and Kathleen the work being done with the RIFS and the EECA. Penni is frustrated with the length of time it will take to go through this process. I then brought up the containment cell. I showed Penni the pictures of the cell and a cross section of the cell showing the double liner, etc. Penni was very impressed with the cell. The question of the depth to the groundwater was brought up. The first mention of "cell" implied to Penni that a hole was going to be dug. Penni was assured that the cell will sit totally above grade - and will not impact the groundwater. This seemed to satisfy her. We told her that EPA TSCA and RCRA have reviewed the cell design and believe that it is protective.

At the conclusion of the meeting, Penni and Kathleen both thought the cell was a good idea and that the removal of sediments this summer would be great. What Penni and Kathleen want to see is action. They both said that their impressions of the meetings they have attended in the past was that no immediate action was planned for Sauget and that it would be years before anything moved forward. We assured her that if there is agreement by all parties on the cell, it will move forward quickly. Penni and Kathleen said they would go back to the citizens and tell them this is a good thing and they think they all should support it. As for the Cahokia town hall meeting this coming Tuesday, neither Penni nor Kathleen can attend.

On the issue of volume of the containment cell, I have had some additional conversation with Bruce Yare and have some clarification. The cell footprint that has been imposed on the Solutia property in the visuals that I sent you last week is for a 50K cy cell. The premise for a 50K cy cell is containment of sediments, creekbed soils and floodplain soils from CS-B/M and sediments only in Sectors C, D & E. The initial estimate of a 15K cy containment cell was for sediments only from CS-B/M. Dependent on the premise selected for floodplain soils and creekbed soils in CS-C, D, & E you can make a case for potential volumes totaling 100K CY.

However, based on what we know today, we believe we should focus first on

the creek sediments in Sectors C, D & E in addition to CS-B/M removal. Therefore, we would propose that the Removal Action include removal of sediments and soils - as defined by the selection criteria - from CS-B/M and sediments only from CS-C, D & E. (See corrected volume description in Section V-B of the attachment- the 1/17 draft of the proposed cleanout criteria). This approach would imply a cell design volume of 50K cy. Nevertheless, we are open to discussion on the volume estimate contingency. A 50K cy design volume would likely provide some excess capacity for yet-to-be discovered needs such as a limited floodplain soils removal south of Sector B. But, I would not want to raise - at this point - the specter of a large floodplain soil removal project, when that may never become necessary. If a floodplain soils removal from CS-C, D & E becomes necessary in the future and additional cell capacity is necessary, we would need to approach the public again on that issue.

Both Bruce Yare and Richard Williams will be at our meeting on Tuesday, January 25 at 3:00 PM at the Site Q trailer and we can answer additional questions you may have at that time.

Mike Light

FYI - A copy of Penni Livingston's and Kathleen O'Keefe's cards:

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